

Mr. Mark Neff  
Padgett, Inc.  
P. O. Box 1375  
New Albany, IN 47151-1375

Re: 043-15545  
First Administrative Amendment to  
FESOP 043-9832-00049

Dear Mr. Neff:

Padgett, Inc. was issued a FESOP on August 6, 1998 for the operation of a metal fabrication plant. A letter requesting a revision in the permit was received on February 1, 2002. The revision related to the addition of one (1) paint booth to the facility. According to 326 IAC 2-8-10(a)(14), a FESOP administrative amendment can be used for a revision that "incorporates a modification that adds an emission unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3". The proposed modification meets this requirement, therefore, the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

1. The Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, with one (1) airless gun, designated as EU-01, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
- (b) One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.
- (c) **One (1) Ameri-cure paint booth, with one (1) airless gun, with a maximum metal input capacity of 2500 lb/hr, with a built-in filter system, exhausting to the outside.**
- (d e) One (1) sand abrasive booth, constructed in 1986, utilized for cleaning metal parts before fabrication and painting, with an abrasive flow rate of 625 lb/hr, controlled by a water settling container and exhausts to a stack designated as S/V 02.
- (e d) One (1) mechanical blast unit, with a blast flow rate of 107, 500 lb/hr, controlled by a dust collector and exhausts inside the building.

2. The facility description in Section D.1. is modified as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) paint booth, designated as EU-01, with one (1) airless gun, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
- (b) One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.
- (c) **One (1) Ameri-cure paint booth, with one (1) airless gun, with a maximum metal input capacity of 2500 lb/hr, with a built-in filter system, exhausting to the outside.**

3. References to the Office of Air Management (OAM) have been changed to the Office of Air Quality (OAQ).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - Floyd County  
U.S. EPA, Region V  
Floyd County Health Department  
Air Compliance Section Inspector - Ray Schick  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR QUALITY**

Padgett, Inc.  
901 E. Fourth Street  
New Albany, Indiana 47151

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 043-9832-00049	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: 8-6-1998

1 <sup>st</sup> Administrative Amendment No: 043-15545	Pages Modified: 5, 26
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Issued by:  
Paul Dubenetzky, Branch Chief  
Office of Air Quality

Issuance Date:

Padgett, Inc.  
New Albany, Indiana  
Permit Reviewer: Nysa L. James

1<sup>st</sup> Administrative Amendment No: 043-15545  
Modified By: Madhurima D. Moulik

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a metal fabrication operation.

Responsible Official: R. J. Padgett  
Source Address: 901 E. Fourth Street, New Albany, Indiana 47151  
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151-1375  
SIC Code: 3441  
County Location: Floyd  
County Status: Attainment for NO<sub>x</sub>, PM<sub>10</sub>, TSP, CO and SO<sub>2</sub>  
Moderate Nonattainment for VOC

Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD and Emission Offset Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, with one (1) airless gun, designated as EU-01, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
- (b) One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.
- (c) One (1) Ameri-cure paint booth, with one (1) airless gun, with a maximum metal input capacity of 2500 lb/hr, with a built-in filter system, exhausting to the outside.
- (d) One (1) sand abrasive booth, constructed in 1986, utilized for cleaning metal parts before fabrication and painting, with an abrasive flow rate of 625 lb/hr, controlled by a water settling container and exhausts to a stack designated as S/V 02.
- (e) One (1) mechanical blast unit, with a blast flow rate of 107, 500 lb/hr, controlled by a dust collector and exhausts inside the building.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Twenty-Five (25) MIG welding stations, with a total maximum wire consumption rate of

- 10.31 lb/hr and exhausts to the general ventilation system of the building.
- (b) One (1) TIG welding station, with a total maximum wire consumption rate of 0.33lb/hr and exhausts to the general ventilation system of the building.
- (c) Six (6) stick welding stations, with a total maximum wire consumption rate of 0.08 lb/hr

Padgett, Inc.  
New Albany, Indiana  
Permit Reviewer: Nysa L. James

1<sup>st</sup> Administrative Amendment No: 043-15545  
Modified By: Madhurima D. Moulik

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## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]

- (a) One (1) paint booth, designated as EU-01, with one (1) airless gun, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
- (b) One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.
- (c) One (1) Ameri-cure paint booth, with one (1) airless gun, with a maximum metal input capacity of 2500 lb/hr, with a built-in filter system, exhausting to the outside.

## Emission Limitations and Standards [326 IAC 2-8-4(1)]

### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of the coatings applied to miscellaneous metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried	3.5

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

### D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8] [326 IAC 2-3]

- (a) That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the paint booths shall be limited to 95 tons per year, rolled on a monthly basis.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.

### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour.

- (b) The  $PM_{10}$  emissions from the paint booths shall not exceed 2.74 pounds per hour.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]